

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Harrisburg Division*

IN RE: CRAIG ALLEN ZIMMERMAN AND MEREDITH ANN ZIMMERMAN	Case No. 1:24-bk-02592-HWV
Santander Bank, N.A.,  Movant  vs.  CRAIG ALLEN ZIMMERMAN AND MEREDITH ANN ZIMMERMAN, Debtors	Chapter 13

**OBJECTION TO CONFIRMATION  
OF DEBTORS' CHAPTER 13 PLAN**

Santander Bank, N.A. ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtors' Chapter 13 Plan* (Doc 3), and states as follows:

1. The Debtors filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 10, 2024.
2. Movant holds a security interest in the Debtors' real property located at 4 North Pearl Street, York, PA 17404 (the "Property"), by virtue of a Mortgage.
3. The Debtors filed a Chapter 13 Plan (the "Plan") on October 10, 2024 (Doc 3).
4. The Plan includes payments toward the Note and Mortgage with Movant, however the figures used by the Debtors are inaccurate. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$28,308.10, whereas the Plan proposes to pay only \$20,520.98.

5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$28,308.10 as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

**BROCK & SCOTT, PLLC**

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing OBJECTION TO CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

MICHAEL A. CIBIK, Debtor's Attorney  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102  
help@cibiklaw.com

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

US Courthouse, US Trustee  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

CRAIG ALLEN ZIMMERMAN  
4 N PEARL ST  
YORK, PA 17404-5310

MEREDITH ANN ZIMMERMAN  
4 N PEARL ST  
YORK, PA 17404-5310

Date: October 28, 2024

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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